

September 19, 2017

*VIA ELECTRONIC FILING*

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

**Re: SES Networks, Notice of *Ex Parte* Presentation in  
Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite  
Service Systems and Related Matters, IB Docket No. 16-408**

Dear Ms. Dortch:

On September 15, 2017, Suzanne Malloy, Philippe Secher, Noah Cherry, Zach Rosenbaum, and Will Lewis of SES Networks (“SES”) met with Jose Albuquerque, Troy Tanner, Chip Fleming and Sankar Persaud of the International Bureau. Karis Hastings, outside counsel to SES, also participated in the meeting via telephone.

The meeting focused on SES’s position on issues in the above-captioned proceedings of importance to both geostationary orbit and non-geostationary (“NGSO”) orbit Fixed Satellite Service (“FSS”) operators. In particular, SES addressed the following issues in the draft Report and Order in the above captioned proceeding:

- Requested that the Commission’s proposal to permit NGSO applicants to certify EPFD compliance include a requirement to make publicly available the input data on which a certification is based;
- Reiterated SES’s argument that the ITU EPFD limits applied in the lower portion of the Ka-band should be extended to cover the 19.3-19.4 GHz and 19.6-19.7 GHz bands;
- Encouraged the Commission to retain the table of satellite frequencies in Section 25.202(a)(1); and
- Requested that the Commission seek comment on a receive earth station pattern in a Further Notice of Proposed Rulemaking in the above captioned proceeding.

Please contact us if you have questions about this submission.

Respectfully submitted,

**SES Networks**

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cc: Jose Albuquerque  
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